

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOHN TABOR,

PLAINTIFF,

-AGAINST-

**NOTICE OF MOTION TO FILE
AN AMENDED COMPLAINT**

11- CV-0195 (FB)(CLP)

NEW YORK CITY, DETECTIVE JAMES
ROPENUS, DETECTIVE MCLAUGHLIN, POLICE
OFFICER SINGLETARY, ASSISTANT DISTRICT
ATTORNEY KEISHA ESPINAL, ASSISTANT
DISTRICT ATTORNEY LAUREN PARSONS,
ASSISTANT DISTRICT ATTORNEY KENNETH
APPLEBAUM, ASSISTANT DISTRICT
ATTORNEY MARJORIE FISHER, DISTRICT
ATTORNEY RICHARD BROWN, AND POLICE
COMMISSIONER RAYMOND KELLY, IN THEIR
INDIVIDUAL AND PROFESSIONAL
CAPACITIES.

DEFENDANTS.

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PLEASE TAKE NOTICE that upon the annexed Declaration of Duncan Peterson and accompanying exhibits, and the supporting Memorandum of Law dated August 18, 2011, Plaintiff John Tabor will move this Court, before the Honorable Pollak at the United States Courthouse for the Eastern District of New York located at 225 Cadman Plaza East, Brooklyn, New York, for an order pursuant to Rule 15 (a) (2) of the Federal Rules of Procedure, granting

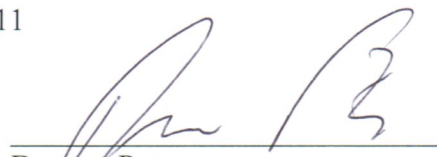
Plaintiff permission to amend the Complaint by adding two defendants, ADA Schindhelm and Police Officer Picone, together with such other relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Honorable Pollak's individual rules, opposition papers, if any, are due on or before September 2, 2011.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Honorable Pollak's individual rules, reply papers, if any, are due on or before September 9, 2011, and the motion will be fully briefed at that time.

Dated: New York, New York

August 18, 2011



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